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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**
10

11 JULIUS CZUDAR,

12 Plaintiff,

13 vs.

14 PRO-VIGIL, INC., a foreign Corporation
headquartered in Texas,

15 Defendant.

Case No.: 2:19-cv-01784-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

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17 IT IS HEREBY STIPULATED by and between Plaintiff Julius Czudar ("Plaintiff"),
18 through his counsel Mullins & Trenchak, Attorneys at Law, and Defendant Pro-Vigil, Inc.,
19 ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have up to and
20 including Tuesday, December 3, 2019, in which to respond to Plaintiff's Complaint. This
21 Stipulation is submitted and based upon the following:

- 22 1. That Defendant's answer or response is currently due on November 19, 2019.
23 2. That this is the first request for an extension of time for Defendant to respond to
24 Plaintiff's Complaint.
25 3. That such an extension is necessary because defense counsel requires additional
26 time to investigate facts that will allow for an informed response to the pending Complaint.
27 4. That this request is made in good faith and not for the purpose of delay.

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5. That nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 15th day of November, 2019.

MULLINS & TRENCHAK, ATTORNEYS AT LAW JACKSON LEWIS P.C.

/s/ Philip J. Trenchak
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Pro-Vigil, Inc

ORDER

IT IS SO ORDERED:

~~United States District Court Judge~~
United States Magistrate Judge

Dated: November 20, 2019